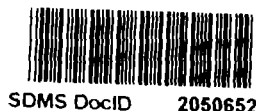




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



September 19, 2005

Ms. Chris Ann Gahagan
Enlibra LLC
5402 Pleasant Grove Lane
Midlothian, VA 23112

RE: BALLY GROUND WATER CONTAMINATION SUPERFUND SITE

Ms. Gahagan:

The United States Environmental Protection Agency (EPA) is in receipt of the document titled, "Aquifer Pumping Test Plan, Proposed Bally Water System Supply Well, Berks County, Pennsylvania", dated August 17, 2005. The document was prepared by Arcadis G&M, Inc. (Arcadis).

EPA has the following comments regarding this document:

1. The length of the aquifer pump test should account for the potential effects of delayed gravity yield (assuming this is an unconfined aquifer). Based on our recent telephone conversation regarding this issue, EPA understands that Enlibra LLC and Arcadis are proposing to perform an aquifer pump test at the Longacre property for a minimum of five days. At the end of five days, EPA understands that Arcadis will evaluate the aquifer pump test data to determine if steady state conditions have been achieved. If steady state conditions have not been achieved at the end of the five day pump test, EPA understands that the pump test may be continued until the data indicates that these conditions have been reached, as appropriate.
2. For the bedrock wells, it may be helpful if a caliper log could be run to identify the vertical locations of the bedrock fractures. Although the observations of the rig geologist are also crucial, it is possible to "miss" some fractures during drilling, especially in higher-yielding boreholes. The number of fracture zones and their vertical location(s) could become important when interpreting the test results.
3. The proposed discharge location appears to be too close to the test, creating a potential interference problem. The proposed location is near MW-2, and is also in a general line between the pumping well and MW-4, which will apparently be drilled into the quartzite and used to evaluate the lithologic boundary conditions.

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4. The plan states that background water-level draw down data will be collected approximately 4 weeks before the test and 4 weeks after the test, which is an acceptable time period. Will this background water level data be collected at monitoring points using transducers?

EPA believes that it would be beneficial to have a brief conference call or Site meeting with the "key players" (PRP, EPA, PADEP, the Borough) involved in the focused feasibility study prior to the performance of the aquifer pump test. The purpose of the call/meeting would be to address the above-listed EPA comments, review the aquifer pump test methodology, and discuss the scenarios which may comprise a steady-state/stop test condition, or a non-steady-state/continue test condition. Please contact me with a proposed time/date for such a meeting.

Please contact me if you have any questions regarding this project at (717) 814-3286.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitch Cron", with a long horizontal flourish extending to the right.

Mitch Cron, RPM
Western PA/MD Remedial Branch

Cc: Mike Bedard, Arcadis G&M, Inc.